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05 JUL 22 2005
TN REGULATORY AUTHORITY
Nashville Office
DOCKET ROOM

July 22, 2005

HAND DELIVERED

Chairman Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

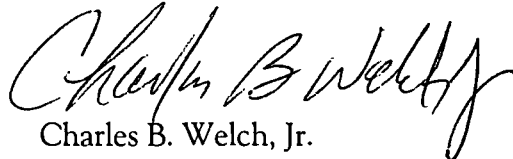
RE: Petition to Establish Generic Docket to Consider Amendments to Interconnection Agreements Resulting from Changes of Law (Docket No. 04-00381)

Dear Chairman Jones:

Please find enclosed for filing, an original and 14 copies of a letter we are filing on behalf of XO Communications and the Southeastern Competitive Carriers Association at the request of Dana Shaffer. Ms. Shaffer is out of town today. Please date stamp one copy for my records. Thank you for your assistance regarding this matter. If you have any questions, or if I may be of further assistance, please do not hesitate to contact me.

Very truly yours,

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC


Charles B. Welch, Jr.

CBW/tp
Enclosures

July 22, 2005

Director Deborah T. Tate
460 James Robertson Parkway
Nashville, TN 37243

**In Re: Petition to Establish Generic Docket to Consider Amendments to Interconnection
Agreements Resulting from Changes of Law
Docket No. 04-00381**

Dear Director Tate:

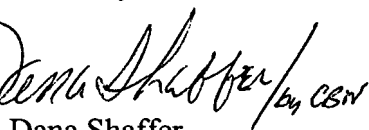
XO Communications Services, Inc. ("XO") has conferred with CompSouth on the issue of withdrawal of issues 7 and 21 from the joint issues matrix in the above-captioned proceeding. As I mentioned at the status conference yesterday, XO was not consulted on the withdrawal of these issues from the docket. SECCA was not consulted on the withdrawal, either.

In filing such withdrawal as agreed to by all of the parties to the docket, CompSouth and BellSouth not only failed to obtain the agreement of all parties, but also failed to mention that issue number 7, dealing with whether changed circumstances can affect a wire center's status as non-impaired, is the subject of a motion for reconsideration filed by a number of CLECs, including XO and US LEC (both SECCA members), in *the Matter of Unbundled Access to Network Elements/Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313/CC Docket No. 01-338 (the "TRRO Docket"). There is also a pending forbearance petition in the docket at the FCC, with comments due September 12.

XO and SECCA do not object to the withdrawal of issue 7 (or issue 21) under the current status of the law, but reserve any and all rights to bring this issue, and any other issue under reconsideration, back before this Authority, in this or a separate docket, should any FCC ruling result in further change of law. Had XO and SECCA been properly consulted in the drafting of the withdrawal filing on behalf of all parties to the docket, the filing could simply have included full disclosure of pertinent information on this issue, and XO and SECCA would have been in support of the filing.

Thank you for ensuring that all parties had, indeed, agreed to the withdrawal of these issues, and for giving XO and SECCA an opportunity to review the matter before agreeing to such withdrawal.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dana Shaffer", followed by a horizontal line and the initials "by CEN".

Dana Shaffer
cc: Counsel of Record